

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

IN RE:	§	CASE NO. 23-70170
	§	
MICHAEL KEITH CANO,	§	CHAPTER 11
	§	
DEBTOR.	§	

**SEER LABS, LLC’S JOINDER TO OBJECTION OF
THE UNITED STATES TRUSTEE TO DEBTOR’S THIRD AMENDED PLAN OF
REORGANIZATION DATED MAY 10, 2024 [Docket No. 75]**

Seer Labs, LLC ("Seer"), a party in interest, files its Joinder to the Objection (the "Objection") of the United States Trustee for Region 7 (the "U.S. Trustee") to Debtor’s Third Amended Plan of Reorganization dated May 10, 2024 (the "Plan," Docket No. 70).

Seer joins in the statutory and factual grounds cited by the U.S. Trustee, and further joins in the U.S. Trustee’s argument that such grounds support denial of confirmation of the Plan.

WHEREFORE, PREMISES CONSIDERED, Seer Labs, LLC, joins in the Objection and respectfully requests that the Court deny confirmation of the Plan and for all other relief to which it may be justly entitled.

Respectfully submitted,

/s/ Jeana Laguna

Jeana Laguna
Attorney in Charge
State Bar No.: 24074611
Southern District No. 1129085
Laguna Law, PLLC
1305 E. Nolana Ave., Suite F
McAllen, Texas 78504
(956) 605-1581
jeana@laguna-law.com

Attorney for Seer Labs, LLC

Certificate of Service

I certify that a true and correct copy of the foregoing document was forwarded to the following persons, as well as those persons required to receive notice of the relief requested and/or who have requested to be served by any applicable Bankruptcy Rule, by the Court's CM/ECF Noticing System, by first class mail, postage prepaid, and/or electronic transmission on June 10, 2024:

Michael Keith Cano
2006 Dorado Diver
Mission, Texas 78573

Antonio Martinez, Jr.
Law Offices of Antonio Martinez, Jr., PC
317 W. Nolana Avenue, Suite C
McAllen, Texas 78504

Jeremy Shane Flannery
615 E. Houston Street, Suite 533
San Antonio, Texas 78205

Andrew Jimenez
United States Trustee
515 Rusk Street, Suite 3516
Houston, Texas 77002

/s/ Jeana Laguna

Jeana Laguna